

# EXHIBIT 34

**In the Matter Of:**  
**Fair Fight vs Raffensperger**

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**Bishop Reginald Jackson**

*October 21, 2019*

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3200 COBB GALLERIA PARKWAY  
SUITE 265  
ATLANTA, GA 30339

1 is the Secretary of State's office is  
2 responsible for oversight of the  
3 elections.

4 BY MR. BELINFANTE:

5 Q. Is it your belief that the Secretary of  
6 State's office intentionally had fewer voting  
7 machines available for purposes of impacting the  
8 election?

9 A. I wouldn't have knowledge of that.

10 Q. Okay. Is it your position that the State  
11 Election Board caused fewer machines to be present  
12 at a polling location to impact the election?

13 MS. BRYAN: Objection to form.

14 THE WITNESS: I wouldn't have  
15 knowledge. But my only point would be  
16 somebody had to make some decision on how  
17 many voting machines were going to be in  
18 different polling places, and I would  
19 hope they would make that decision based  
20 on what the turn-out was during early  
21 voting.

22 BY MR. BELINFANTE:

23 Q. But sitting here today, you don't know  
24 who that person is that would make --

25 A. No.

1 Q. Okay. And so not -- I'm not trying to  
2 split hairs here, but do you believe that Secretary  
3 Kemp -- is it the position of the Sixth District  
4 A.M.E. church that Secretary Kemp failed to oversee  
5 the election or that Secretary Kemp intentionally  
6 caused voters not to be able to vote who were  
7 otherwise entitled to vote?

8 A. Our contention is that he did not  
9 effectively oversee the election.

10 Q. Okay.

11 A. That's like the Falcons coach, I don't  
12 think he did anything intentionally, but he didn't  
13 do a very good job.

14 Q. And similar question, do you -- is it the  
15 position of the Sixth District A.M.E. church that  
16 the State Election Board failed to oversee the  
17 election or intentionally caused persons who were  
18 eligible to vote to not be able to vote?

19 A. See, my contention is the State Election  
20 Board has done a lousy job of handling elections  
21 since I've been in Georgia. Because the issue is  
22 who's in charge of the election, is it the  
23 Secretary of State or is it the election board?  
24 I'm not sure if both can be.

25 Q. And so is it the position of the A.M.E.

1 those documents that have been provided to the  
2 Sixth District's attorney through members  
3 complaining about voting experiences, are you aware  
4 of any documentation that would show or otherwise  
5 tend to prove that there was intentional  
6 discrimination on the part of either then-Secretary  
7 Kemp or the State Election Board?

8 A. I just think the --

9 MS. BRYAN: Objection to form.

10 THE WITNESS: I just think the  
11 conduct of the election on Election Day  
12 demonstrates that.

13 BY MR. BELINFANTE:

14 Q. But you don't know of documents to do it?

15 A. No, I don't think anybody would have any  
16 documents that they would allow to get out to show  
17 that they suppressed the vote.

18 Q. Okay. I'll show you what we'll mark as  
19 Exhibit 16.

20 A. I'm going to tell my staff don't let me  
21 write no more --

22 Q. That's a common thing I hear in  
23 depositions.

24 (Whereupon, Defendant's  
25 Exhibit 16 was marked for

1 MR. BELINFANTE: Thank you.

2 BY MR. BELINFANTE:

3 Q. Is the Sixth Episcopal District A.M.E.'s  
4 position that Secretary Kemp intentionally  
5 suppressed votes of minorities?

6 A. The Sixth Episcopal District position is  
7 that attempt was made to suppress the black vote.  
8 And our position is, whether it was the Secretary  
9 of State, whether it was the State Election Board  
10 since they keep coming up, whoever it was, for us  
11 the end result is the same, that, in fact, the  
12 black vote was suppressed.

13 Q. And is -- was that --

14 A. And I don't think it was coincidence.

15 Q. And so is it the Sixth Episcopal  
16 District's position that it was, in fact,  
17 intentional to suppress minority votes?

18 A. Yes.

19 Q. Okay. And what evidence do you have to  
20 support that it was an intentional decision made to  
21 suppress minority votes?

22 A. A lot of incidents that happened that  
23 we've talked about today happened in minority  
24 areas. You didn't have happen in other areas of  
25 the state what happened in areas where

1 predominantly minority people are located.

2 Q. And those are the things we discussed  
3 today, "exact match"?

4 A. The "exact match," "use it or lose it,"  
5 the people whose names were dropped from the roll,  
6 people who had to use provisional ballots, just a  
7 number of things which made it more difficult for  
8 minorities to vote than, say, for whites to vote.

9 Q. Okay. And do you believe that minority  
10 voter registration was higher in 2018's election  
11 than in prior --

12 A. Oh, yes.

13 Q. -- elections in Georgia? Okay.

14 A. Matter of fact, I think it's interesting  
15 that the former Secretary of State, now the  
16 governor, even took Ms. Abrams to court because she  
17 had a voter registration effort --

18 Q. Are you familiar with that effort?

19 A. -- some years ago. Well, I know it was  
20 alleged that there was fraud or whatever, but I  
21 don't think it was ever proved or demonstrated in  
22 court.

23 Q. Do you know who actually made the  
24 allegations that there was fraud involved in the  
25 voter registration?

1       there was an effort to close polling locations.

2               Whether or not the State approved it or  
3       not, it -- but again, and I think if I'm correct,  
4       the Secretary of State at that time, Brian Kemp,  
5       eventually came out and said that those polling  
6       sites should not have been closed.

7               But whether or not -- you know, again,  
8       the Secretary of State's office is responsible for  
9       oversight of the election. And I think out of  
10      this, somebody needs to define what it means for  
11      the Secretary of State to have oversight of the  
12      election.

13              Q.   Okay. But sitting here today, you're not  
14      aware of anything where the Secretary told a county  
15      or a city to close or consolidate a location?

16              A.   No. If I was in the office, I might have  
17      a little evidence, but.

18              Q.   In your personal office or the  
19      secretary's office?

20              A.   The Secretary of State's office.

21              Q.   Understood. Okay, sir.

22                    Is it the position of the Sixth Episcopal  
23      District that the laws governing what has been  
24      referred to as "exact match" --

25              A.   Uh-huh.